U.S. Department of Justice

United States Attorney
Southern District of New York

United States Courthouse
300 Quarropas Street
White Plains, New York 10601

January 27, 2021

The Honorable Paul E. Davison
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

> **Re:** *United States v. Caswell Senior*, 20 Cr. 626 (PMH)

Dear Judge Davison:

      In advance of tomorrow's bail hearing for Defendant Caswell Senior, the Government submits this short letter to update the Court as to a recent development that only adds to the already strong basis for detention. As referenced in Senior's reply (*see* ECF Doc. No. 108 at 2), just last week, Senior's co-defendant Jarrett Crisler, Jr. was charged for an October 2020 gang-related shooting outside of a Miami strip club. Senior, who was celebrating his birthday at the strip club with Crisler and a band of other Gorilla Stone members, sparked the shooting when, as detailed in the Crisler complaint (*see* ECF Doc. No. 102-2 at ¶¶ 5-6): (1) Senior flashed the Gorilla Stone gang sign at a rival Crip gang member; (2) the Crip told Senior that he was flashing the wrong sign; (3) Senior escalated the confrontation by threatening the Crip "u wanna die tonight"; (4) one of the parties gestured to a gun; and (5) Crisler fired his gun twice, hitting the Crip. For this additional conduct, and for the many reasons noted in its multiple earlier submissions (*see* ECF Doc. Nos. 51 at 10-11; 79), the Government continues to agree with the recommendation of Pretrial Services that there is no condition or combination of conditions that will reasonably assure the appearance of the defendant as required and the safety of the community.

Respectfully submitted,

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